



EXHIBIT R

Lindsey Rodgers <lrodders@cookpclaw.com>

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**Re: Confirmation of sent files: Sean Alexander file**

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Sean Alexander <sean@autocrashanalysis.com>

Wed, Mar 15, 2023 at 6:29 PM

To: Edward Cook <ecook@cookpclaw.com>

Cc: Robert Underwood <runderwood@cookpclaw.com>, Lindsey Rodgers <lrodders@cookpclaw.com>

Good afternoon,

I don't know what else to say except that the only email address I had for your firm was in the deposition. I did the best that I could .

Thank you,

image001.jpg

**Sean**

C.A.R. Crash Analysis &  
Reconstruction

**Phone:** 478-256-3312

**Sean Alexander : 478-256-3300**

**Email:** [Billing@autocrashanalysis.com](mailto:Billing@autocrashanalysis.com)

Mailing address: [449 Granada Terrace Warner Robins, Ga 31088](#)

Physical Address: [524 S. Houston Lake Road, Suite L. Warner Robins, Ga 31088](#)

[www.autocrashanalysis.com](http://www.autocrashanalysis.com)

On Mar 15, 2023, at 6:23 PM, Edward Cook <[ecook@cookpclaw.com](mailto:ecook@cookpclaw.com)> wrote:

RE: Laribee v. Gypsum/Higgs

Mr. Alexander:

I am extremely disappointed in your response that I received at 4:31 p.m. Nowhere on the subpoena does the name Robert Underwood even appear. Your statement that the only email address that you were in possession of was Robert Underwood is to say the least extremely curious given that my Georgia address, including my email address is clearly located on the federal subpoena under my signature line. Please be advised Mr. Underwood and our IT consultant have checked the firm's email servers and we are not able to locate your purported email (via any in-box, spam and/or junk location). In other words, our firm has no record of any type of receipt of your purported email. There was no such email to our office as you suggest. The subpoena's production location was clear Suwanee, Georgia and [ecook@cookpclaw.com](mailto:ecook@cookpclaw.com). We will be sending your response that we received today as you contend is proof of service to Mr. Underwood to an expert for analysis. Please do not delete and/or destroy any communication, file, document, email, memo, note, email server, software, email attachment, and/or cell phone or business phone records that has any regard to the Laribee matter.

Notwithstanding any of the foregoing, the production is nowhere near complete nor in compliance with the subpoena.. Please be advised that we will be filing a Motion of Non-Compliance in the United States District Court in Georgia in the next few days and you will have the opportunity to be heard and explain your position to the court.

I look forward to getting to the bottom of this "misunderstanding."

Sincerely,

Edward S. Cook  
Attorney  
[ecook@cookpclaw.com](mailto:ecook@cookpclaw.com)  
COOK, pc  
970 Peachtree Industrial Blvd  
Suite 202  
Suwanee, GA 30024  
Phone: (404) 841-8485  
Fax: (678) 541-5408

[www.cookpclaw.com](http://www.cookpclaw.com)

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On Mar 15, 2023, at 4:31 PM, Sean Alexander <[sean@autocrashanalysis.com](mailto:sean@autocrashanalysis.com)> wrote:

I received your email. It states that I failed to respond. I only had the email for [runderwood@cookpclaw.com](mailto:runderwood@cookpclaw.com). I sent the file to that email on the 10<sup>th</sup> of March. Attached is a forward of that email. I hope this clears up any misunderstanding. But I did send it when asked.

Thanks,



From: [Filemail.com](mailto:Filemail.com) <[no-reply@filemail.com](mailto:no-reply@filemail.com)>

Sent: Friday, March 10, 2023 4:48 PM

**Subject:** Confirmation of sent files: Sean Alexander file



From: Sean Alexander <[sean@autocrashanalysis.com](mailto:sean@autocrashanalysis.com)>

# Sean Alexander file

I copied the email addresses from the depositions as it was the only one i had for the plaintiff attorney.

Sean Alexander  
C.A.R. Crash Analysis & Reconstruction LLC  
524 Houston Lake Road Suite L  
Warner Robins, Georgia 31088

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10023 files, 78.3 GB - Files will be deleted on Sunday, April 9, 2023

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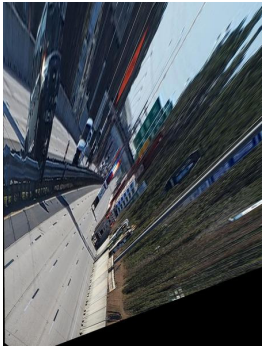
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Vehicle Scan Report

Vehicle: 2018 Ford Focus SE  
VIN: 1FADP3H18JL111111  
Scan Date: 03/23/2021 12:23:52

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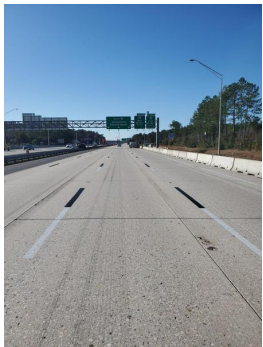
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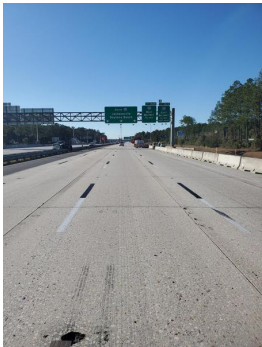
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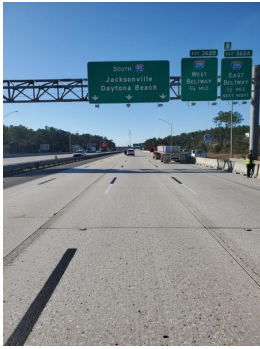


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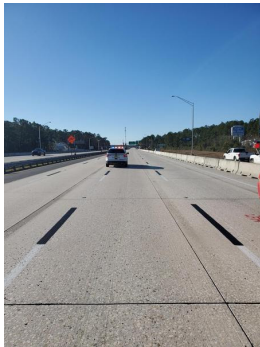
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C.A.R. Crash Analysis & Reconstruction LLC. Sean Alexander-President



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